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USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 02/28/2022



Handley Farah & Anderson PLLC

August 27, 2021

VIA ECF

Honorable Valerie E. Caproni
United States District Judge
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 240
New York, NY 10007

Re: Belle, et al., v. City of New York, et al., 19 CV 2673 (VEC)

Dear Judge Caproni:

Plaintiffs respectfully write with Defendants' consent, in accordance with the Court's Rule 5(B)(ii), to request that an exhibit in Plaintiffs' motion to amend reply papers be filed under seal. The exhibit is Plaintiff Edison Quito's Domain Awareness System "Snapshot Report," which was produced and labeled by IBM as "HIGHLY CONFIDENTIAL." The document also contains Quito's photograph and personal information, as well as sensitive informational fields. These facts weigh in favor of filing under seal, notwithstanding the presumption of access discussed by the Second Circuit in *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119-20 (2d Cir. 2006).

Thank you for your consideration of this matter.

Respectfully submitted,

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Application GRANTED.

The Clerk of Court is respectfully directed to close the open motion at docket entry 150.

SO ORDERED.



Date: February 28, 2022

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE